

application was apparently a consensus decision on the part of the subordinate Interior officials in charge of the matter, and the primary pressure against further delay appears to have come from those officials. Moreover, there is some evidence that the decision was consistent with a concern held by Babbitt and others at Interior that off-reservation gaming not be approved in the face of significant local opposition; a concern that was not weighed uniformly in prior or subsequent Interior land-into-trust decisions. In any event, Babbitt seems to have had no direct involvement in the decision.

It should be noted that evidence of events subsequent to the Hudson decision evinces a perception among those who opposed the Hudson proposal that the DNC (and specifically Chairman Fowler) was willing to request White House intervention (specifically by Ickes) for Democratic contributors on matters pending before Interior, and even in connection with the discussion of specific contributions from the interested constituents. In June 1996, less than a year after Interior issued the Hudson decision, former Interior Chief of Staff Collier arranged a meeting for his new clients, the Shakopee tribe, with Fowler at the DNC about an adoption ordinance issue pending at Interior. The Shakopee were vigorously opposing an effort by a faction of Shakopee dissidents to get Interior to reconsider prior approval of an adoption ordinance. (*See supra* at 170-72.) Two of the participants in this meeting for the Shakopee tribe had attended the meeting at the DNC on April 28, 1995, in which the Shakopee and others sought Fowler's assistance with the White House and Interior to defeat the Hudson proposal. In the briefing memorandum Collier sent to the DNC the day before the meeting on June 4, 1996, Collier informed DNC staff that the Shakopee would be making a \$20,000 contribution to the